

STANDARDIZED TIER SURVEY RESULTS

JULY 1998

RESPONDENTS*(Mailed to 16 operators and 12 LEAs)*

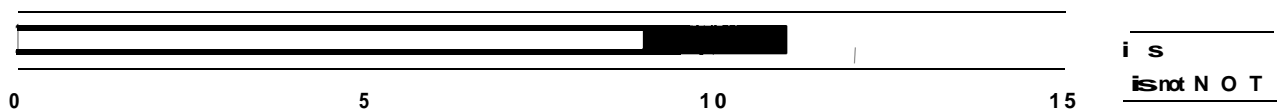
0 Operators 3
 • Local Enforcement Agencies 7
 Total 10

FACILITIES

• Green Material Composting Facilities 8
 • Sewage Sludge Composting Facilities 1
 • Animal Material Composting Facilities 2
 Total 11

QUESTIONS AND RESPONSES

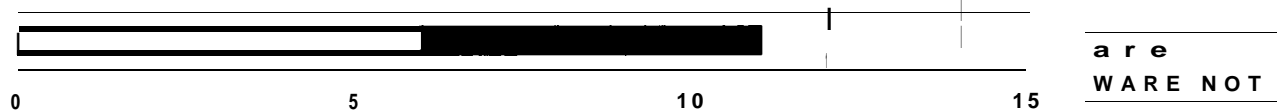
1. The facility [is][is not] properly placed within the tiers?



Comments:

- Environmental and health concerns were addressed by a CUP and the LEA does not have direct enforcement authority over the CUP. Odor and other violations are deferred to county code enforcement. Minimum standards are weak for Standardized composting permits.
- The facility has chicken manure that has caused odor problems. If the problems increase we would want to condition that part of the operation.

2. The permit conditions [are][are not] sufficient to govern operations of the facility?



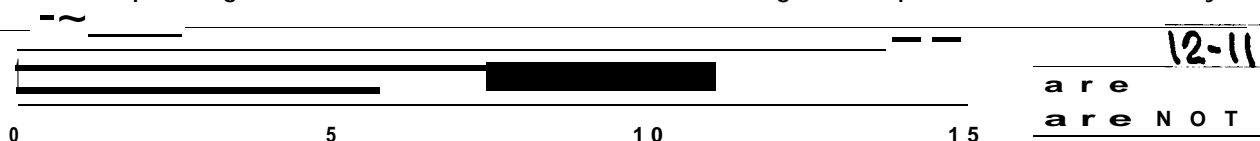
Comments:

- Facility has problems with "trash" in the compost. Standardized permit does not allow for requirements specific to this site.
- Standardized permit allows no conditions. How do you enforce alternative methods? If compost facility is over a CIA site, how do you condition for site?

Conditions Needed:

- | | |
|----------------------------------|--------------------------------------|
| • Construction of composting pad | • Hazards |
| • Wet season operations | • Nuisances |
| • Hours of operation | • Windrow location |
| • Feedstock processing times | • Noise |
| • Vectors | • Dust |
| • Odor impacts | • Pathogens |
| • Litter | • Storage of feedstocks and products |

3. Minimum operating standards [are][are not] sufficient to govern operations of the facility?



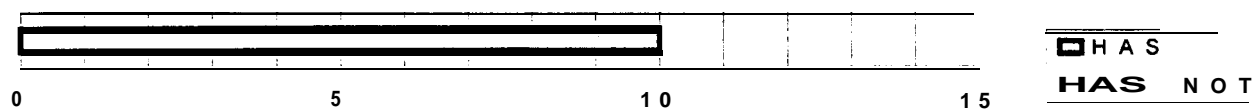
Comments:

- Testing of material is excessive given long history of consistent results.
- Facility located at an airport. FAA requirements should be incorporated into permit.
- Without specific permit conditions, 14 CCR 17867(a)(4) is too weak. It is not clear what "minimize" means. There should be standards that require parameters to be controlled within specific criteria spelled out in regulation (i.e., as approved by the EA).

Standards Needed:

- Construction of composting pad
- Wet season operations
- Hours of operation
- Feedstock processing times
- 0 Vectors
- Odors

4. A local authority [has][has not] issued a land use permit for the facility.



- 6 of 7 local authorities enforce the land use permit
- 0 of 8 facilities are located in zoning areas that allow operation without a land use permit
- 0 of 7 jurisdictions have areas that would allow operations without a land use permit

Note: Figures for 4.a., b., and c. differ from total number of facilities and jurisdictions because some respondents did not respond to the questions.

Comments:

- Facility is owned by the City, which also issued the land use permit. Permit has few restrictions.
- The LEA jurisdiction includes incorporated as well as unincorporated areas. An incorporated area might allow such an operation without a CUP (though not likely). LEAs have less input with cities than with counties (generally).

5. The process timeline (30 days) [was][was not] an issue.



Comments:

- It was not an issue only because the LEA and operator worked with draft documents prior to application submittal; otherwise there would have been a problem. Also, the LEA was very involved in the CUP for this site – the issues were resolved – before the SWFP application was submitted.
- Existing facility already in CIWMP.

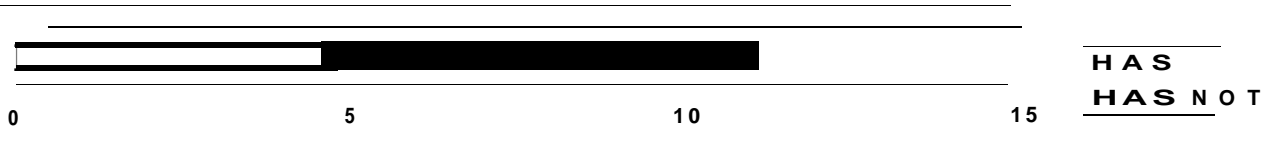
6. If available, I [would][would not] be interested in having a Full solid waste facilities permit for this facility.



Comments:

- To allow flexibility in feedstock materials and composting methods.
- "Local" conditions should have been included for this permit.
- Standardized conditions and minimum standards are weak.
- To restrict specific activities.

7. The inability to make changes to a Standardized permit [has][has not] been an issue for me.



Comments:

- May want the ability to experiment with other feedstocks.
- All solid waste facilities are subject to local peculiarities, which must be addressed but cannot be addressed in the Standardized permit.
- A change of operator will be too cumbersome.
- Makes a sloppy site.
- So far operator has worked with LEA.

ADDITIONAL COMMENTS

- I strongly agree with permit simplification, which was the intent of the tiered permits. However, I also strongly believe that all facilities, regardless of size, should provide the EA with an operational document and be subject to conditions to address local concerns.
- The ability to make minor changes with local approval and LEA scrutiny (without having to formally revise/obtain a new permit) with respect to compost and feedstock processing would be valuable.
- Planning departments need to be more aware of solid waste issues and encouraged to work in tandem with LEAs on projects, especially where Standardized permits are required. Applicants should be allowed to upgrade to Full permit especially if they are composting food (animal) waste, grease pumpings, or other feedstocks capable of creating public nuisances.
- A good operator that works with the LEA doesn't have a problem with any permit types – the problem operators are what we need Full permit and permit conditions for.